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January 7, 2022

**VIA E-FILING**

Ms. Jocelyn D. Boyd  
Chief Clerk and Administrator  
SC Public Service Commission  
101 Executive Center Drive  
Columbia, SC 29210

RE: Annual Review of Base Rates for Fuel Costs for Dominion Energy South Carolina,  
Inc. (For Potential Increase or Decrease in Fuel Adjustment or Fuel Costs)  
Docket No. 2022-2-E

Dear Ms. Boyd:

Enclosed please find for filing the Petition to Intervene Out of Time on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/lbk  
Enclosures

cc: All parties of record (w/encl. via Electronic Mail))

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2022-2-E**

IN RE:	)	
Annual Review of Base Rates for Fuel Costs	)	
For Dominion Energy South Carolina, Inc.	)	<b>PETITION TO INTERVENE OUT</b>
(For Potential Increase or Decrease in Fuel	)	<b>OF TIME BY SOUTH CAROLINA</b>
Adjustment or Fuel Costs)	)	<b>ENERGY USERS COMMITTEE</b>

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and to be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That S.C. Code Ann. §58-27-865 (B) establishes a procedure for annual fuel hearings to allow the Commission and all interested parties to review the fuel purchasing practices and policies of Dominion Energy South Carolina, Inc. ("DESC"), and for the Commission to determine if any adjustment in the fuel cost recovery mechanism is necessary and reasonable.

2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State; SCEUC is organized for the purposes of intervening and participating in regulatory proceedings to advocate for cost based electric rates that are just and reasonable.

3. That members of SCEUC take electric service from DESC, consuming and purchasing substantial amounts of electricity from the Company.

4. That SCEUC and its members have a real, material and substantial interest in the subject matter to be addressed and resolved by the Commission in this docket as SCEUC members will suffer an adverse impact if obligated for payment of increased electric rates, charges and tariffs; as a consequence, SCEUC's members will be aggrieved by an order by the Commission adjusting, changing and increasing DESC's electric rates, charges and tariffs.

5. That the interests of SCEUC's members are not adequately represented by the current parties to this proceeding.

6. That SCEUC requests that the Commission grant its petition to intervene out of time. The Notice of Filing and Public Hearing and Prefile Testimony Letter were issued in this docket October 13, 2021, and an Amended Notice of Filing and Public Hearing was issued on December 7, 2021. These notices provide that the Petition to Intervene was due December 3, 2021. However, these notices also provide that the first substantive filing in this docket is not due until February 7, 2022, when DESC is to file its direct testimony. SCEUC regularly participates in DESC's annual fuel adjustment proceeding, and other proceedings before the Commission. SCEUC's participation in this case may help the Commission determine if any adjustment to DESC's fuel cost recovery mechanism is necessary and reasonable. Permitting SCEUC to intervene out of time will advance the Commission's goal of encouraging the widest participation in these proceedings as is practicable. At this stage of the proceedings no party or stakeholder will be prejudiced by permitting SCEUC to intervene out of time.

7. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

8. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum

public participation in issues before it and should be allowed so that a full and complete record addressing its views and concerns can be developed.

9. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

  
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WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.

  
\_\_\_\_\_  
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*Attorney for the South Carolina Energy  
Users Committee*

Columbia, South Carolina  
January 7, 2022

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them via Electronic Mail and return address clearly marked on the date indicated below:

RE: Annual Review of Base Rates for Fuel Costs for Dominion Energy South Carolina, Inc.

DOCKET NO.: 2022-2-E

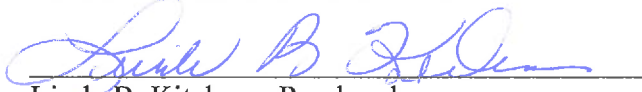
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PLEADING:

Petition to Intervene Out of Time

January 7, 2022

  
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